

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
District Court File No. 15-mj-984 (KES)

UNITED STATES OF AMERICA,)
)
Plaintiff,) **ABSENCE OF OBJECTION BY**
) **THE UNITED STATES TO**
v.) **EXTENSION MOTION OF**
) **DEFENDANT**
KHAALID ADAM ABDULKADIR,)
)
Defendant.)

On December 22, 2015, defendant Khaalid Adam Abdulkadir filed and served several motions in the above-captioned case.

In Document No. 25, "Motion for Extension of Discovery Deadline," defendant seeks an order extending the discovery *deadline* to a date ten days after the government certifies that it has completed discovery in this case; in Document No. 26, defendant's Memorandum in support of that motion, defendant seeks an extension, to the same date, of the due date for discovery *motions*.

The government understands the defendant to be seeking an extension of the due date for discovery motions, or for suppression motions based upon the discovery provided. The government also notes that because it understands its disclosure obligations to be continuing, any communication to defense counsel that disclosures are complete will necessarily be a communication that disclosures are complete as of a given date - if additional information subject to disclosure comes into the government's possession later that additional information will be disclosed notwithstanding any prior

certification. With these qualifications, the government does not object to the extension sought by the defendant.

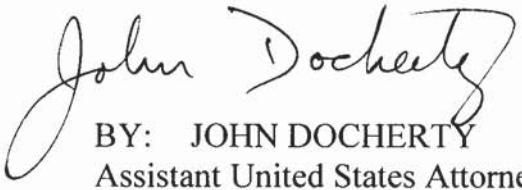
Additionally, while defendant's assertion that the government had provided three documents to the defendant was correct as of the time of the motion, the government has today provided additional disclosures to the defendant.

The government will respond substantively to the balance of defendant's December 22 motions within the time set by this Court's Scheduling and Case Management Order.

Dated: Dec, 23, 2015

Respectfully Submitted,

ANDREW M. LUGER
United States Attorney


BY: JOHN DOCHERTY
Assistant United States Attorney